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May 20, 2021

The Honorable P. Kevin Castel
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
Manhattan, New York

Re: *United States v. Otto Salguero Morales*, S5 15 Cr. 379
United States v. Ronald Salguero Portillo S5 15 Cr. 379

Dear Judge Castel,

I am writing on behalf of my client Otto Salguero Morales and co-defendant Ronald Salguero Portillo, to request an adjournment of the status hearing in this case, which is scheduled for May 26, 2021. As further explained in this letter, there are two matters currently pending before the Court: (1) a *Curcio* motion filed by the Government with respect to only defendant Otto Salguero; and (2) motions for case reassignment filed separately by counsel for Otto Salguero Morales and Ronald Salguero Portillo. The defense and the Government have consulted among themselves and jointly suggest that this Court conduct an “in person” *Curcio* hearing on or about June 28, 2021 with defendant Otto Salguero Portillo and thereafter schedule a status conference in the case at the Court’s convenience. In support of this, undersigned counsel notes as follows:

Currently pending before the Court is a motion filed by the Government requesting a *Curcio* hearing in this case because of undersigned counsel’s prior representation of other defendants. *See* DE 321. As the Government noted in its motion, Mr. Otto Salguero previously executed a written waiver of any potential conflict of interest. The Government has requested the *Curcio* hearing out of an “abundance of caution.” Undersigned counsel does not object to the request, but has not had the opportunity to speak with defendant Otto Salguero in the last few weeks because he has been shuttled back and forth between the federal detention centers in New York and placed in quarantine with no access to counsel. I therefore also would like the additional time in order to more formally prepare my client for the *Curcio* hearing. As is generally the protocol in such matters, undersigned counsel would be prepared to conduct the *Curcio* hearing in person at the next status conference.

In addition, each of the defendants filed a motion requesting the random reassignment of this case. *See* DE 322 and 323. The Court ordered the Government to respond on May 28, 2021 and the defendants would like the opportunity to submit reply pleadings in support of the motion. After the briefing is complete, the parties will be prepared to discuss how to address any open matters with the Court at the next scheduled joint status conference.

The defendants each waive their speedy trial rights until their next respective return to Court.

Thank you for consideration of this matter.

Respectfully submitted

Robert Feitel

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